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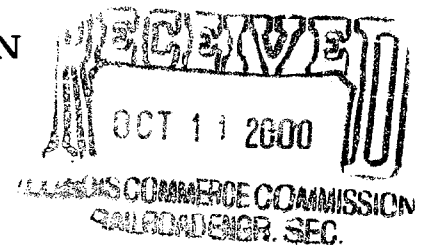
STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

CITY OF GRANITE CITY,
an Illinois municipal corporation,

Petitioner,

ILLINOIS DEPARTMENT OF TRANSPORTATION
GATEWAY EASTERN RAILWAY COMPANY,
GATEWAY WESTERN RAILWAY COMPANY,
NORFOLK SOUTHERN RAILWAY COMPANY,
and UNION PACIFIC RAILROAD,

Respondents.



Docket No. T00-0003

**INTERROGATORIES OF RESPONDENTS GATEWAY EASTERN RAILWAY
COMPANY AND GATEWAY WESTERN RAILWAY COMPANY
DIRECTED TO ILLINOIS COMMERCE COMMISSION STAFF**

COME NOW Respondents Gateway Eastern Railway Company and Gateway
Western Railway Company and pursuant to Section 200.360(c) of the Illinois
Commerce Commission Rules of Practice and Rule 213 of the Illinois Rules of Civil
Procedure propound the following interrogatories to the Illinois Commerce
Commission Staff to be answered in writing and under oath within 28 days of the date
of service of these interrogatories.

1. With respect to the rail-highway grade separation project (including
associated grade crossing closures and road relocations) that is the subject matter of the
Petition filed by the City of Granite City in this cause (hereinafter referred to as

DOCKETED

"Pontoon Road Grade Separation Project"), state in detail how the project benefits each railroad that operates trains through the Pontoon Road grade crossing.

RESPONSE:

2. Quantify in dollars, or as a percentage of the total project costs, the benefit of the Pontoon road Grade Separation Project to each railroad and explain how you calculated that figure.

RESPONSE:

3. State the percentage of the total cost of the Pontoon Road Grade Separation Project that benefits the City of Granite City and/or its citizens.

RESPONSE:

4. State in detail how the Pontoon Road Grade Separation Project benefits the City of Granite City and/or its citizens.

RESPONSE:

5. Quantify in dollars, or as a percentage of total project costs, the benefit of the Pontoon Road Grade Separation Project to the City of Granite City and/or its citizens and explain how you calculated that figure.

RESPONSE:

6. State the percentage of the total cost of the Pontoon Road Grade Separation Project that benefits Madison County and/or its citizens.

RESPONSE:

7. State in detail how the Pontoon Road Grade Separation Project benefits Madison County and/or its citizens.

RESPONSE:

8. Quantify in dollars, or as a percentage of total project costs, the benefit of the Pontoon Road Grade Separation Project to Madison County and/or its citizens and explain how you calculated that figure.

RESPONSE:

9. State the percentage of the total cost of the Pontoon Road Grade Separation Project that benefits the State of Illinois and/or its citizens.

RESPONSE:

10. State in detail how the Pontoon Road Grade Separation Project benefits the State of Illinois and/or its citizens.

RESPONSE:

11. Quantify in dollars, or as a percentage of total project costs, the benefit of the Pontoon Road Grade Separation Project to the State of Illinois and/or its citizens and explain how you calculated that figure.

RESPONSE:

12. State whether the Pontoon Road Grade Separation Project benefits any entity besides the City of Granite City, Madison County, the State of Illinois, and the railroads that operate trains through the grade crossing at Pontoon Road, and with respect to each such entity, state the following:

- a. Identify the entity.
- b. Describe in detail the benefit to such entity.

- c. Quantify in dollars, or as a percentage of total project costs, the benefit of the project to such entity and explain how you calculated that figure.

RESPONSE:

13. State whether any analysis has been made of the impact, if any, the failure to include federal funding in the Pontoon Road Grade Separation Project will have on the availability of state funding for other highway or highway-rail crossing projects in the state of Illinois over the next ten years, and if so, with respect to each such analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such analysis.
- b. The title and date of each written report relating to such analysis.

RESPONSE:

14. State how much of the total cost of the Pontoon Road Grade Separation Project is directed to relocation of roads and utilities and how you determined that amount.

RESPONSE:

15. State the number of motor vehicle-train collisions you project will occur at the Pontoon Road Crossing in each of the next twenty years if the grade separation is not built and the crossing is left in its present configuration, stating how many of the projected collisions each year will involve fatalities and how many will involve injuries requiring medical attention.

RESPONSE:

16. In accordance with Supreme Court Rule 213 (g) please state the following:

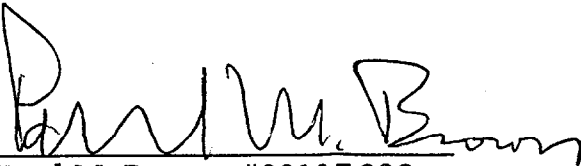
- (a) the name, address and telephone number of all opinion witnesses;
- (b) the subject matter on which each opinion witness is expected to testify;
- (c) the conclusions and opinions of each opinion witness and the bases therefor;
- (d) the qualifications of each opinion witness;
- (e) please produce a copy of all reports of retained opinion witnesses and copies of all documents or other material supplied to, relied upon or utilized by said opinion witnesses in formulating their opinion, other than books and treatises, and a complete copy of the file prepared by and maintained by said opinion witnesses with regard to allegations set forth in Petitioner's Petition.

RESPONSE:

OF COUNSEL:

Thompson Coburn LLP

Respectfully submitted,

By 

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CERTIFICATE OF SERVICE

The undersigned states that a true and correct copy of the foregoing interrogatories were deposited in the U.S. Mail, first Class, postage prepaid on the 3rd day of October, 2000, addressed to each of the following:

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